

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

SINGH, SAHILDEEP)

Case No. 8:24-MJ-417 (MJK)

Defendant.)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of September 6, 2024, in the county of Clinton in the Northern District of New York the defendant violated:

Code Section

8 U.S.C. § 1324(a)(1)(A)(ii)

Offense Description

The Defendant, knowingly and in reckless disregard of the fact that aliens have come to, entered, or remained in the United States in violation of law, did transport, move and attempt to transport and move, such aliens within the United States by means of transportation or otherwise in furtherance of such violation of law for purposes of private financial gain.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

9/8/2024 - 2:00PM

*D. Matthews**Complainant's signature*

U.S. Border Patrol Agent Dustin M. Matthews

Printed name and title

Attested to by the Affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 9/10/2024

*Mitchell J. Katz**Judge's signature*

City and State: Syracuse, New York

Hon. Mitchell J. Katz, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, United States v. SINGH, SAHILDEEP.

This criminal complaint is based on the following facts:

On September 2, 2024, Swanton Sector Intelligence Unit (SIU) identified a black Jeep Cherokee, bearing New York registration xxxx059, that had been detected within the Burke Border Patrol Station's area of responsibility on multiple occasions, in a manner consistent with known smuggling techniques. SIU identified the registered owner of the vehicle as K.S. from South Richmond, New York.

On 9/6/2024, at approximately 2:57 PM the black Jeep Cherokee was detected via electronic surveillance equipment travelling north on Lost Nations Road in Churubusco, New York. In the past two years, Burke Border Patrol Station has had an unprecedented increase in illegal cross border activity. Lost Nations Road is an area notoriously used by alien smuggling organizations for smuggling illegal aliens that cross into the United States from Canada.

At approximately 2:59 PM, the same black Jeep Cherokee was detected on electronic surveillance equipment travelling south on Lost Nations Road. Agents observed that the vehicle now was heavily laden in the rear suspension. This is consistent with smuggling trends observed by agents in this area. Agents observed the black Jeep Cherokee pass their location at the intersection of State Route 11 and Lost Nations Road in Churubusco, New York. Agents observed that the passenger's compartments were filled with people and luggage. Agents pulled out and began following the vehicle as it proceeded east on State Route 11.

At approximately 3:09 PM, Agents performed a vehicle stop on State Route 11 in the town of Churubusco, New York. Agents approached the vehicle and identified themselves as United States Border Patrol Agents in the English Language. The driver, later identified as SAHILDEEP SINGH, responded in the English language. Agents asked SINGH what country he was a citizen of, to which he responded India, but claimed he had a lawful status in the United States. Agents asked SINGH what brought him to the area and SINGH responded that he came here to see the mountains. At this time, Agents observed that the vehicle was occupied beyond its safe traveling capacity. Agents asked SINGH who the people in the vehicle were and SINGH responded that he did not know them, and his brother asked him to pick them up on "Clinton Road." Agents asked SINGH where he picked them up and he said on the side of the road.

At this time agents detained SINGH to question the passengers in the vehicle as to their citizenship. Agents discovered a total of eight passengers in the vehicle. Three of the eight passengers were attempting to conceal themselves under the luggage in the rear storage compartment of the vehicle. All eight subjects claimed to be citizens of India and admitted to crossing illegally into the United States. Agents observed that the eight subjects had wet sneakers and damp lower pant legs. This is commonly observed by Border Patrol Agents when making apprehensions of people who illegally entered the United States by walking through the woods. None of the eight subjects were in possession of any documentation that would allow them to enter or remain in the United States legally. All subjects were detained and transported to the Burke Border Patrol Station for record checks, interviews and processing.

At the Burke Border Patrol Station, biographical information and fingerprints were entered into Department of Homeland Security databases for all nine subjects. Record checks confirmed information that was previously gathered roadside, namely that all of the passengers were illegal aliens, not United States citizens, and had no lawful authority to be in the United States.

At the Burke Border Patrol Station, SINGH was read his *Miranda* rights and agreed to speak with agents without an attorney present. SINGH stated that he knew that the people he picked up were illegally present in the United States. SINGH said that he was going to take the people to Plattsburgh and Queens, New York. SINGH stated

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that he was getting paid \$600 dollars for the trip. SINGH said that he had picked people up in the same area in the past.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1
OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

9/8/2024 - 2:00PM

D. Matthews

Dustin M. Matthews
U.S. Border Patrol Agent

I, the Honorable Mitchell J. Katz, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on September 10, 2024, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Mitchell J. Katz

Hon. Mitchell J. Katz
United States Magistrate Judge